



## DISABILITY AND COMMUNICATION ACCESS BOARD

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### INTERPRETIVE OPINION

Pursuant to §103-50, Hawaii Revised Statutes (HRS), all buildings and facilities constructed by, or on behalf of the State or any county, shall conform to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) and amendments. In accordance to HRS §103-50 and Chapter 11-217, Hawaii Administrative Rules, the Disability and Communication Access Board has authority to issue interpretive opinions to HRS §103-50 design standards.

**Docket:** **DCAB 2003-07:** Do the technical specifications for benches in locker rooms (see attached recommendations) provide equal or greater access than ADAAG 4.35.4?

**Summary:** Exhibit A is a copy of Section 4.37 Benches from the ADAAG Recreation Facilities, Final Rule, which was issued by the Access Board on September 3, 2002. The requirements of this rule will become part of the enforceable ADA standards once adopted by the Department of Justice.

Exhibit B is a copy of Section 901 Benches from the Revision of ADA and ABA Accessibility Guidelines, Proposed Rule, which was published on November 16, 1999. Currently, the Revision of ADA and ABA Accessibility Guidelines is in the process of becoming a final guideline, and is not enforceable by the Department of Justice.

One of the differences between the ADAAG and Exhibits A and B is back support. The ADAAG states that accessible benches shall be “fixed to the wall.” Exhibits A and B states that “benches shall have back support that is 42 inches (1065 mm) minimum in length and that extends from a point 2 inches (51 mm) maximum above the seat to a point 18 inches (455 mm) minimum above the seat.” The guideline in Exhibits A and B gives the designer flexibility to install freestanding benches, located away from the wall. This flexibility could allow the installation of more lockers, which is beneficial in alterations where space is limited.

**Ruling:** For buildings or facilities subject to HRS §103-50,

#### **ADAAG 2.2 and 4.35.4**

The technical specifications for benches in locker rooms, as shown in attached Exhibits A and B, provide equal or greater access to ADAAG 4.35.4.

[Rul: 06/18] (Auth and Imp: HRS §103-50)

If you have any questions or comments regarding this ruling, please call us at 586-8121.

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## EXHIBIT A – ADAAG, Recreation Facilities (Final Rule, 9/3/02)

### 4.37 Benches.

**4.37.1 General.** Benches required to be accessible by 4.1 shall comply with 4.37.

**4.37.2 Clear Floor or Ground Space.** Clear floor or ground space complying with 4.2.4 shall be provided and shall be positioned for parallel approach to a short end of a bench seat.

**EXCEPTION:** Clear floor or ground space required by 4.37.2 shall be permitted to be obstructed by readily removable seats in saunas and steam rooms.

**4.37.3\* Size.** Benches shall be fixed and shall have seats that are 20 inches (510 mm) minimum to 24 inches (610 mm) maximum in depth and 42 inches (1065 mm) minimum in length (see Fig. 47).

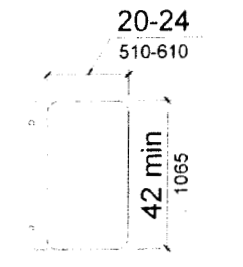


Fig. 47  
Size of Bench

**4.37.4 Back Support.** Benches shall have back support that is 42 inches (1065 mm) minimum in length and that extends from a point 2 inches (51 mm) maximum above the seat to a point 18 inches (455 mm) minimum above the seat (see Fig. 48).

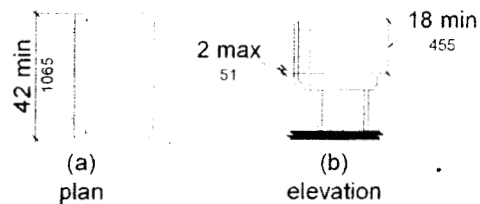


Fig. 48  
Bench Back Support

**4.37.5 Seat Height.** Bench seats shall be 17 inches (430 mm) minimum to 19 inches (485 mm) maximum above the floor or ground.

**4.37.6 Structural Strength.** Allowable stresses shall not be exceeded for materials used when a vertical or horizontal force of 250 lbs. (1112 N) is applied at any point on the seat, fastener, mounting device, or supporting structure.

**4.37.7 Wet Locations.** The surface of benches installed in wet locations shall be slip-resistant and shall not accumulate water.

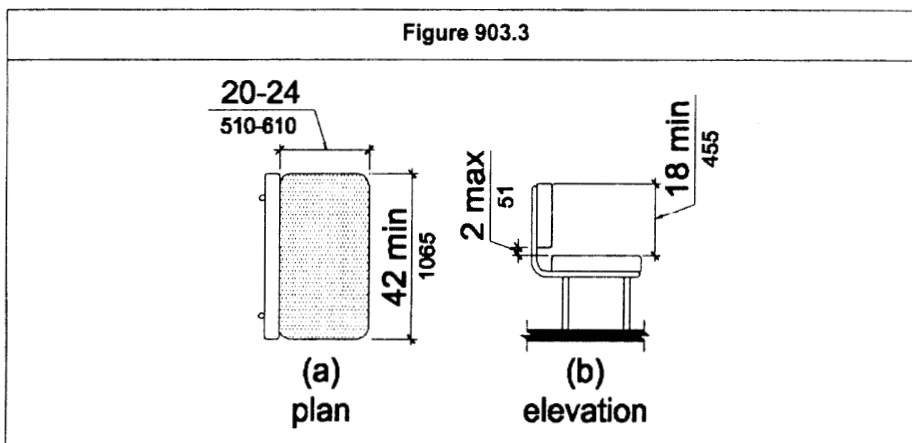
## EXHIBIT B – ADAAG (Proposed Rule, 11/16/99)

### 903 Benches

**903.1 General.** Benches required to be *accessible* shall comply with 903.

**903.2 Clear Floor or Ground Space.** Clear floor or ground space complying with 305 shall be provided and shall be positioned for parallel approach to an end of the bench seat.

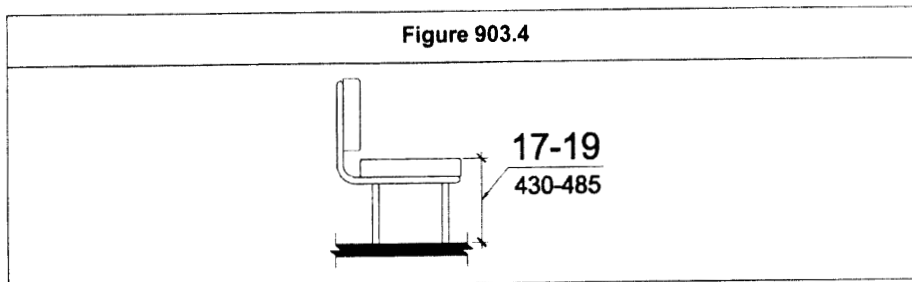
**903.3 Size.** Benches shall have seats that are 20 inches (510 mm) minimum to 24 inches maximum (610 mm) in depth and 42 inches (1065 mm) minimum in length. The bench shall be installed and shall have back support. Back support shall be 42 inches (1065 mm) minimum in length and shall extend from a point 2 inches (51 mm) maximum above the seat to a point 18 inches (455 mm) minimum above the seat.



#### Advisory 903.3

In dressing rooms where benches are fixed to the wall for back support, consideration should be given to providing grab bars on walls adjacent to the bench but not on the seat back, to assist an individual to transfer to the bench.

**903.4 Height.** The bench seat shall be 17 inches (430 mm) minimum to 19 inches (485 mm) maximum above the floor or ground.



**903.5 Structural Strength.** Allowable stresses shall not be exceeded for materials used when a vertical or horizontal force of 250 lb (1112 N) is applied at any point on the seat, fastener, mounting device, or supporting structure.

**903.6 Wet Locations.** Where installed in wet locations, the surface of the seat shall be slip resistant and shall not accumulate water.